

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VASSILIOS MANIOS,

Petitioner,

-against-

EVANGELIA MANIOS ZACHARIOU,

Respondent.

Index No.: 14 CV 4331 (LTS)

**NOTICE OF CROSS-MOTION TO
CONFIRM ARBITRATION AWARD
AND AWARD ATTORNEYS' FEES**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Opposition to First Amended Petition to Vacate Arbitration Award and In Support of Cross-Motion to Confirm Arbitration Award and For the Award of Attorneys' Fees, and the Declaration of Derek J. T. Adler executed September 30, 2013, together with attached exhibits, Respondent Evangelia Manios Zachariou will cross-move this Court, at a date to be set by the Court, in the United States Courthouse for the Southern District of New York, for an Order (1) confirming the International Centre for Dispute Resolution's March 21, 2014 Final Award (the "Final Award") and its June 19, 2014 Disposition of Applications for Modification/Clarification of Final Award pursuant to 9 U.S.C. §§ 201-208, (2) granting Respondent her attorneys' fees for responding to Petitioner's First Amended Petition to Vacate pursuant to 28 U.S.C. § 1927 and the Court's inherent powers, and (3) granting such other and further relief as the Court deems just and proper under the circumstances.

Dated: New York, New York
September 30, 2014

Respectfully submitted,

HUGHES HUBBARD & REED LLP

/s/ Derek J.T. Adler

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